

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

DOUGLAS JOHNSON, )  
)  
Plaintiff, )  
)  
vs. ) No. 22-cv-03718  
)  
COOK COUNTY SHERIFF THOMAS )  
DART, in his official )  
capacity, ANTWAUN BACON, a )  
CCDOC officer, and COOK )  
COUNTY, a municipal )  
corporation, )  
Defendants. )

Deposition of ANTWAUN BACON, taken  
before Rhonda K. Weiland, CSR, by Zoom  
videoconference, pursuant to the Federal Rules of  
Civil Procedure for the United States District Court  
pertaining to the taking of depositions, commencing  
at 10:32 o'clock A.M., on the 14th day of February,  
2024.

1           PRESENT:

2           DVORAK LAW OFFICES, LLC  
3           111 West Washington Boulevard  
4           Suite 1611  
5           Chicago, Illinois 60602  
6           BY: MR. ADRIAN BLEIFUSS PRADOS  
7           (773)641-4667  
8           ableifuss@gmail.com

9                        Appeared on behalf of the Plaintiff;

10           COOK COUNTY STATE'S ATTORNEY'S OFFICE  
11           50 West Washington Boulevard  
12           Suite 500  
13           Chicago, Illinois 60602  
14           BY: MR. JAMES O'CONNOR  
15           (312)603-1880  
16           james.oconnor@cookcountysao.org

17                        Appeared on behalf of Defendant Cook  
18                        County Sheriff Thomas Dart and Cook  
19                        County;

20           DEVORE RADUNSKY LLC  
21           230 West Monroe Street  
22           Suite 230  
23           Chicago, Illinois 60606  
24           BY: MR. ZACHARY STILLMAN  
             (312)300-4479  
             zstillman@devoreradunsky.com

                      Appeared on behalf of Defendant  
                      Antwaun Bacon.

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February 14th, 2024

ANTWAUN BACON

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(Exhibits not tendered.)

1           THE COURT REPORTER: Before we proceed, I  
2 will ask counsel to agree on the record that there  
3 is no objection to this deposition officer  
4 administering a binding oath to the witness  
5 remotely.

6           Please state your agreement on the record,  
7 beginning with the taking attorney.

8           MR. BLEIFUSS PRADOS: The plaintiff  
9 agrees.

10          MR. STILLMAN: Defendant Bacon agrees.

11          MR. O'CONNOR: We agree.

12                               (Witness sworn.)

13           ANTWAUN BACON,  
14 after being first duly sworn, testified as follows:

15                               EXAMINATION

16          BY MR. BLEIFUSS PRADOS:

17           Q. Good morning, sir. Could you please state  
18 your full name and spell it for the record.

19           A. Antwaun Bacon, A-n-t-w-a-u-n, Bacon,  
20 B-a-c-o-n.

21           Q. And are you currently employed by the Cook  
22 County Sheriff?

23           A. Yes.

24           Q. What is your position within the sheriff's

1 office?

2 A. I works external ops, operation.  
3 Basically we work, patrol the outside perimeter of  
4 the jail and hospitals.

5 Q. And what is your rank?

6 A. Officer.

7 Q. Have you ever been deposed before?

8 A. Say again.

9 Q. Have you ever testified in a deposition  
10 before?

11 A. No.

12 Q. I'll just explain a few basic ground  
13 rules. I think you're doing a very good job, but  
14 sometimes it's easy to jump in when you hear a  
15 question because you know what the lawyer is about  
16 to ask you, and so it's natural in human  
17 conversation to jump in. But it's important for you  
18 to wait for the question to be completed before you  
19 answer.

20 Does that make sense?

21 A. Yes.

22 Q. And that's in part to help the court  
23 reporter have a clean record as she's taking down  
24 everything we are saying.

1 Does that make sense?

2 A. Yes.

3 Q. If I ask a question in a way that is at  
4 all confusing to you, I ask that you please just ask  
5 me to restate it. Otherwise, I will assume that you  
6 understood the question.

7 Does that make sense?

8 A. Yes.

9 Q. Also, you can take a break wherever you'd  
10 like. I'd just ask that you not take a break while  
11 a question is pending.

12 Does that make sense?

13 A. Yes.

14 Q. And again, you're doing a good job so far,  
15 but it's important that you answer verbally as  
16 opposed to nodding the head or saying uh-huh just to  
17 make it easier for the court reporter. Okay?

18 A. Yes.

19 Q. All right. When were you first hired by  
20 the sheriff's department?

21 A. March 2nd, 1999.

22 Q. Is there a rank that you attained when you  
23 first enter, like probationary officer or anything  
24 like that?

1           A.    Yes.  You first come in, you on probation  
2   for a year.

3           Q.    Okay.  And then after that you're a full  
4   officer?

5           A.    Yes.

6           Q.    Have you been a full officer since then?

7           A.    Yes.

8           Q.    And have you worked at any facilities  
9   other than the Cook County jail in your capacity as  
10  an employee of the sheriff?

11          A.    As of right now, I do work some outside  
12  hospitals.

13          Q.    And does that work involve transporting  
14  persons who are detained at the jail to hospitals?

15          A.    Yes.

16          Q.    Have you worked in external operations for  
17  your entire career at the sheriff's office?

18          A.    No.

19          Q.    Where did you first work?

20          A.    I first worked, I worked in Division 11.

21          Q.    And what were your duties there?

22          A.    I was a officer, so basically a  
23  correctional officer.  Basically you assigned to  
24  tiers working with detainees and IICs.

1           Q.    Where did you work after your stint at  
2    Division 11?

3           A.    That's when I came to ex ops, external  
4    operations.

5           Q.    Did you -- have you graduated from high  
6    school?

7           A.    Yes.

8           Q.    And what high school did you attend?

9           A.    Calumet High School.

10          Q.    And do you have any college education?

11          A.    No.

12          Q.    Have you ever been a member of the armed  
13    forces?

14          A.    No.

15          Q.    Have you ever served in any law  
16    enforcement agency apart from the sheriff's office?

17          A.    I work some part-time, security guards.

18          Q.    And when did you work as a security guard?

19          A.    Say maybe five years ago.

20          Q.    Okay. And that was concurrent with your  
21    work at the sheriff's office? It's okay to work a  
22    security job on the side?

23          A.    Yes.

24          Q.    And when did you move from Division 11 --



1 I'm sorry. Go ahead.

2 A. Say again.

3 Q. I thought you were about to say something.

4 A. No. I was coughing, clearing my throat.

5 Q. When did you move from Division 11 to  
6 external operations?

7 A. It was either in 2019 or 2020.

8 Q. In July of 2020, were you working in  
9 external operations?

10 A. Yes.

11 Q. And without getting into the substance of  
12 anything that you may have said to your lawyer or  
13 that your lawyer has said to you, how have you  
14 prepared for this deposition, if at all?

15 A. Nothing. Just by memory.

16 Q. When you say "just by memory," what do you  
17 mean?

18 A. When I was told about the case, I met with  
19 a lawyer that came and told me about the case and be  
20 prepared for it. That's it.

21 Q. Okay. Did you review any documents in  
22 preparation for this deposition?

23 A. No.

24 Q. Have you read the complaint in this

1 lawsuit?

2 A. I was told about it.

3 Q. Okay. Do you have a recollection of the  
4 incidents described in the complaint?

5 A. Yes.

6 Q. Are your duties in external operations  
7 today, as we sit here in 2024, more or less similar  
8 to your duties in July of 2020?

9 A. Yes.

10 Q. When does your shift begin?

11 A. 0545.

12 Q. 5:45?

13 A. Yes.

14 Q. Okay. And when does it end?

15 A. At 1400.

16 Q. And where do you first report for work?  
17 Where physically in the jail or the complex there on  
18 California do you report to work?

19 A. MHTC.

20 Q. I'm sorry, can you say that again?

21 A. MHTC.

22 Q. MHTC. And what does that stand for?

23 A. That I really don't know. It's like the  
24 old boot camp.

1           Q.    Are there lockers there?  What's the  
2   facility like?

3           A.    Where we report at, it's at the front  
4   hallway.  There are gun lockers there that people  
5   can secure their weapon and a desk where officer  
6   sits and that's it.

7           Q.    Okay.  And I've been in the jail during  
8   shift changes, and a lot of people are coming in and  
9   out with clear plastic backpacks.

10               Is that part of the process?

11           A.    Yes.

12           Q.    Okay.  And where do people store those  
13   backpacks?

14           A.    I don't know.  It depends on wherever  
15   they're working at.  I can't answer where everyone  
16   store their backpacks, you know.  It's different  
17   parts of the jail that people works.

18           Q.    Are there different lockers available to  
19   correctional personnel throughout the jail?

20           A.    Yes.

21           Q.    And when you show up at the MHTC, are you  
22   given a particular assignment, or do you know what  
23   you're doing that day, or how does that work?

24           A.    We show up at MHTC.  That's where we have

1 roll call. And for roll call, that's where we get  
2 our assignment. And from there, we leave out of  
3 roll call and go to your particular destination  
4 assignment.

5 When working with external operation, it  
6 can be too because if I'm working at, you know, like  
7 I said, we work some hospitals. So I might be  
8 assigned to Stroger Hospital one particular day and  
9 I have to report to Stroger Hospital. So...

10 Q. Okay. And on those days you don't even go  
11 to the MHTC?

12 A. No.

13 Q. You go straight to the hospital?

14 A. Yes.

15 Q. Okay. And when you transport inmates or  
16 detainees to and fro between the jail and the  
17 hospital, what sort of vehicle do you use?

18 A. You use a Cook County sheriff squad car or  
19 it can be a van.

20 Q. Okay. And do you drive those, or are  
21 there particular drivers assigned to do that?

22 A. If you're assigned to that particular  
23 assignment, we drive them.

24 Q. Okay. So do you recall where you were

1 assigned to work on July 19th, 2020?

2 A. July 19th, 2020?

3 Q. Yes.

4 A. It depends on what shift. I was normally  
5 at my -- working ex ops. My particular assignment,  
6 I don't know where I was at that morning.

7 Q. Do you recall where you were assigned to  
8 work when you interacted with Douglas Johnson, the  
9 plaintiff in this lawsuit, in July of 2020?

10 A. Yeah. I was working divisions in  
11 Division 1.

12 Q. Okay. What were your duties at  
13 Division 1?

14 A. I was to transport IICs back and from  
15 their particular division. I was assigned to RTU,  
16 and my assignment was to transport IICs to and from  
17 the visits in Division 1 back to their division to  
18 RTU.

19 Q. And what does RTU stand for?

20 A. Division 8.

21 Q. Division 8?

22 A. Uh-huh.

23 Q. Division 8 is the medical division;  
24 correct?

1           A.     Yes.

2           Q.     Okay.   How far is Division 1 from the  
3   medical division?

4           A.     That I don't (audio distortion).

5           Q.     I'm sorry.   I couldn't hear you.

6           A.     I don't know.   Could be a block or two.

7           Q.     A block or two?

8           A.     Yeah.

9           Q.     Okay.   And have you been -- prior to  
10   July 19th, 2020, had you been assigned that job  
11   before, transporting people in Division 1 from the  
12   medical division?

13          A.     It depends on what assignment.   To that  
14   particular unit, no.   I can be assigned to different  
15   ones.   They don't give you every day because that's  
16   not my regular unit.   I was over there doing  
17   overtime, so they can give you different ones to  
18   assign you every day when you do come over.

19          Q.     So that was -- I'm sorry.   I interrupted.  
20   I apologize.

21          A.     Uh-huh.

22          Q.     Go ahead.

23          A.     I said no, that's -- when I worked over  
24   there, it was like a volunteer assignment.

1           Q.    So that was not your regular duty;  
2 correct?

3           A.    No.    No.

4           Q.    Now, do you recall where you first saw  
5 Douglas Johnson on July 19th, 2020?

6           A.    In Division 8 in RTU in the hallway.

7           Q.    And if you remember, was he standing or  
8 sitting when you first saw him?

9           A.    Standing.

10          Q.    And you said "in the hallway." Did I hear  
11 that correctly?

12          A.    Yes.

13          Q.    Okay. And do you recall that he had a  
14 cane at the time?

15          A.    Yes.

16          Q.    Do you recall any words exchanged, any  
17 conversation you had with him initially?

18          A.    I -- when they come to the hallway, I went  
19 to handcuff him, and he stated that he has a no  
20 handcuff order. I asked him to produce it, I have  
21 to see it. He couldn't produce it, so I told him he  
22 has to be handcuffed when you're walking through the  
23 tunnels of the jail. It's procedures.

24          Q.    Okay. In terms of handcuffs, do you have

1       handcuffs on you while you're working at the jail?

2           A.     Yes.

3           Q.     Okay. And are there different types of  
4       handcuffs or do you -- are you familiar with  
5       different types of handcuffs, I guess is my  
6       question?

7           A.     No. We're -- jail, we use one particular  
8       handcuff.

9           Q.     Okay. And is that, are those the  
10       handcuffs that you carry on your person?

11          A.     Yes.

12          Q.     Okay. And can you describe the handcuffs  
13       in any more detail in terms of how they work?

14          A.     Particular handcuffs, they're two metal  
15       cuffs that go around your wrist, and they also have  
16       a little circle in there. It's like a secondary  
17       security device to wear. Once you handcuff the  
18       person, you hit the little switch so the handcuff  
19       cannot move or tighten up as they're being  
20       transported or walked around.

21          Q.     And the handcuffs can be either loose or  
22       tighter depending on how they're adjusted,  
23       correctly -- correct?

24          A.     Once we adjust them and once we hit the



1     little switch, no, they cannot be moved.

2           Q.     But I'm saying that you can choose, when  
3     you apply the handcuffs initially, you can decide  
4     how tightly or loosely they are fastened about the  
5     subject's wrists; correct?

6           A.     Correct.

7           Q.     Okay. And how do you gauge how tightly  
8     the individual should be handcuffed?

9           A.     Normally once you put the handcuffs on  
10    someone, if you can take two of your fingers and  
11    insert them into the handcuff, that's how you know  
12    they have -- it's not tight and they can be -- they  
13    have room in there to move around.

14          Q.     And where you -- can you describe where  
15    you insert the fingers?

16          A.     Just anywhere within the handcuffs.

17          Q.     Okay. And do the handcuffs click as they  
18    get progressively tighter?

19          A.     Yes.

20          Q.     Okay. Do -- is there any certain  
21    number of clicks that you're looking to hear?

22          A.     No.

23          Q.     And, all right, so you applied the  
24    handcuffs to Mr. Johnson. Did you then click on the

1 additional security measure?

2 A. Yes.

3 Q. Okay. And do you recall you did that just  
4 because you always do that or because you have a  
5 specific recollection of that?

6 A. I always do that.

7 Q. Okay. Is it your testimony that you put  
8 your fingers in there and tested how loose the  
9 handcuffs were?

10 A. Yes.

11 Q. Okay. And do you specifically recall  
12 doing that, or is that just something that you're  
13 saying because you always do that?

14 A. It's something that I would always do.

15 Q. Okay. And what, what happened next, I  
16 guess is my question?

17 A. He lined up, and we walked over to  
18 divisions.

19 Q. Can I ask that you just speak up a little  
20 bit. I'm sorry.

21 A. I had the IICs line up, and we walked over  
22 to the division, to Division 1 visiting.

23 Q. Okay. When you say "IICs," what does that  
24 mean?

1           A.     They're called individual in custody. We  
2 no longer refer to them as detainees or inmates. We  
3 refer to them as IICs. It's individual, individual  
4 in custody.

5           Q.     Okay. All right. Is there -- is  
6 Division 8 and Division 1 connected by a tunnel?

7           A.     Yes.

8           Q.     Okay. And when you first encountered  
9 Mr. Johnson, was he at the tunnel level or was he  
10 above tunnel level?

11          A.     Above.

12          Q.     Okay. And how did he get down to the  
13 tunnel level?

14          A.     We walked.

15          Q.     Okay. Down stairs?

16          A.     No, took elevator.

17          Q.     Okay. And what, if anything, was  
18 Mr. Johnson saying to you?

19          A.     Nothing.

20          Q.     If you recall?

21          A.     Nothing. Once he stated to me that he had  
22 a handcuff order and I asked him to produce it and  
23 he couldn't produce it and he have to be handcuffed  
24 and all that, I tell him it's procedures that I --

1     that you must be handcuffed when you walk through  
2     the tunnels.

3           Q.     And when you applied the handcuffs, were  
4     there any other sheriff's office personnel around  
5     there?

6           A.     I believe his tier officer.

7           Q.     Do you believe his tier officer would have  
8     witnessed you put the handcuffs on him?

9           A.     I can't say to what he might have  
10    witnessed or not.

11          Q.     Did you discuss handcuffing Mr. Johnson  
12    with any other sheriff's personnel?

13          A.     No.

14          Q.     And when you got down to the tunnel level,  
15    is this a trajectory that you do frequently enough  
16    that you can remember it, or is this, was this a  
17    very unusual event for you?

18          A.     No.   It's the way there, I can remember  
19    it.

20          Q.     You can remember it?

21          A.     Yes.

22          Q.     So when you get out of the elevators at  
23    the lower level, where do you turn; or do you go  
24    straight?

1           A.    No.  You get off and you turn probably to  
2   the right.

3           Q.    Okay.  And then how far do you walk  
4   towards the right?

5           A.    That I don't recall.

6           Q.    Okay.  Can you estimate in feet?

7           A.    Couple feet.  I don't...

8           Q.    So fewer than 10 feet?

9           A.    That I don't recall.  I don't work over  
10  there on a regular.

11          Q.    Okay.  And was Mr. Johnson walking with  
12  his cane?

13          A.    Yes.

14          Q.    Okay.  And now I think you said he's  
15  designated as a IIC.  Is that the right terminology?

16          A.    Yes.

17          Q.    Okay.  And I think you used the plural.  
18  So were there other people you were transporting --

19          A.    Yes.

20          Q.    -- to -- okay.

21                How many people were you transporting at  
22  that time?

23          A.    Yes, I don't recall.

24          Q.    Okay.

1           A.    No.

2           Q.    Was it more than three?

3           A.    It was more than three.

4           Q.    Okay.  And did any of those other people  
5 have canes or other visible disabilities?

6           A.    No.

7           Q.    And so after walking to the right, do you  
8 then turn?

9           A.    I believe so.

10          Q.    Okay.  Which direction do you turn?

11          A.    You have to head north.  It's north  
12 towards the Division 1.

13          Q.    Okay.  And how far do you walk in that  
14 direction?

15          A.    That I don't know.

16          Q.    Would it be a matter of blocks?

17          A.    That I don't know.

18          Q.    Would it be more than a hundred feet?

19          A.    Could be.

20          Q.    Okay.  How many times do you estimate  
21 you've escorted people down that passageway?

22          A.    Like I said, that's not a regular  
23 assignment, so I don't know.  I just go down on a  
24 volunteer-type thing.

1           Q.    So would it be fair to say that you don't  
2   have a very good recollection of what that hallway  
3   looks like?

4           A.    How the tunnel look like?

5           Q.    Yes.

6           A.    Yes.   Yes.

7           Q.    It would be fair to say you don't have a  
8   good recollection of that; is that correct?

9           A.    No.

10          Q.    Okay.   You do have a recollection of it.  
11   Okay.

12                   Can you describe what the walls look like  
13   or the floor looks like?

14          A.    Made out of cement.   I believe they're  
15   painted yellow.   And the -- that we walk on is a  
16   dark color.

17          Q.    All right.   And did you observe  
18   Mr. Johnson as he moved down this hallway?

19          A.    Yes.

20          Q.    Did he appear to be having difficulty as  
21   he was moved down the hallway?

22          A.    Nope.

23          Q.    Your testimony is no?

24          A.    No.

1           Q.    Okay. Did Mr. Johnson complain about the  
2   tightness in his handcuffs?

3           A.    No.

4           Q.    Okay. And is it fair to say that so far  
5   this is a relatively uneventful and ordinary  
6   transport of a detainee between divisions?

7           A.    Yes.

8           Q.    Okay. Then at the end of this hallway,  
9   what happens physically in terms of your trajectory?  
10   Do you turn? Do you go upstairs? What do you do?

11          A.    I believe you do have to make a series of  
12   turns to get to Division 1, and then when you do get  
13   to Division 1, you have to walk up a little hill to  
14   get to the actual division.

15          Q.    Okay. And when you say walk up a hill, do  
16   you mean up a ramp --

17          A.    Yes.

18          Q.    -- or up stairs? What do you mean?

19          A.    Like a ramp.

20          Q.    Up a ramp?

21          A.    Uh-huh.

22          Q.    Okay. And how steep is that ramp? Can  
23   you estimate it by degree?

24          A.    That I don't know.



1           Q.    Okay.  Is it basically you're going up one  
2 story?

3           A.    Going up one story?

4           Q.    You're going up one story in terms of  
5 levels?

6           A.    Yes, perhaps so.

7           Q.    Okay.  So is the meeting -- is the meeting  
8 area in Division 1 on the ground level?

9           A.    Is the meeting -- what do you mean, "the  
10 meeting area"?  Explain.

11          Q.    The area where inmates meet with visitors,  
12 the visiting center?

13          A.    No.  No, you have a -- once you get up  
14 into Division 1, then when you have to go out into  
15 the yard where they visit because the visit was in  
16 the outside yard, you have probably a couple stairs  
17 you have to walk up.

18          Q.    Okay.  How many steps are on those stairs?

19          A.    Probably three, four.

20          Q.    Is it your testimony that at no point  
21 along this walk did Mr. Johnson complain about his  
22 handcuffs?

23          A.    No, he didn't.

24          Q.    And it's your testimony that at no point

1 along this walk he had any difficulty walking?

2 A. No.

3 Q. Okay. This is the summer of 2020, so is  
4 it fair to say that there were specific  
5 COVID-related regulations in place?

6 A. Yes.

7 Q. And what was expected at the time, if you  
8 recall, in terms of masks and masking of detainees,  
9 staff, and visitors?

10 A. When you're walking through the hallway,  
11 you must wear a mask. That's about it.

12 Q. Okay. And what about when you're not --  
13 well, first of all, for staff, are they expected to  
14 wear -- were they expected to wear masks at all  
15 times?

16 A. Yes.

17 Q. Okay. And inmates were expected or  
18 detainees were expected to wear masks when they  
19 walked down the hallways?

20 A. Yes.

21 Q. Is that your testimony?

22 A. Yes.

23 Q. What about visitors, if you recall?

24 A. At that time I believe so, yes.

1 Q. They were required to wear masks?

2 A. Yes.

3 Q. Okay. And so when you get up to the  
4 Division 1, the visiting area is in the yard. Is  
5 that your testimony?

6 A. Say again.

7 Q. The visiting area is in the yard. Is that  
8 your testimony?

9 A. Yes.

10 Q. And how big is that yard?

11 A. It's very big I can say.

12 Q. Like bigger than a baseball -- I'm sorry.  
13 Go ahead.

14 A. No, not bigger than a baseball field.

15 Q. Okay. Is it as big as the infield of a  
16 baseball field?

17 A. I don't know how big the infield of a  
18 baseball field is.

19 Q. Okay.

20 A. It's in a field in a tent, so it's pretty  
21 spacey.

22 Q. Okay. And was there -- okay. And are  
23 there paved walkways or is it grassy? Can you  
24 describe it at all?

1           A.     So when you walk up to where the tent is,  
2     well, I believe it's a paved walkway right there;  
3     but when they go into the tent, they're in the  
4     grass.

5           Q.     And again, you -- it's your testimony that  
6     you don't recall how many people you were  
7     transporting in that trip?

8           A.     No, I don't.

9           Q.     Okay. And so when -- at what point are  
10    they -- you escort them up through, up the stairs  
11    through the Division 1 building and then to this  
12    yard where they visit people; is that correct?

13          A.     Correct.

14          Q.     And then when they get to the yard, are  
15    they free to walk around wherever they want to go --

16          A.     No.

17          Q.     -- or do you take them to -- okay.

18                 So what happens?

19          A.     Once we bring them to the tent, basically  
20    there's a officer and a supervisor that sits there.  
21    The family are assigned to a table, and then  
22    they're, the IIC is instructed to go to whatever  
23    table that their family is assigned to.

24          Q.     Okay. So you -- do you take them to these

1 tables one by one, or how does that work?

2 A. No. They lined up. The officers that's  
3 at the table assign them, tell them what table to go  
4 to, and they walk there on their own.

5 Q. Okay. And do you recall observing  
6 Mr. Johnson walk through the yard?

7 A. No.

8 Q. You have no recollection of that?

9 A. No.

10 Q. Do you recall who was visiting him?

11 A. No.

12 Q. Do you recall what they looked like?

13 A. No.

14 Q. Do you recall whether it was one person or  
15 more than one person?

16 A. No. I don't sit at the table. I just  
17 transport them.

18 Q. Okay. And is it fair to say that you  
19 don't recall because for you -- well, it's your  
20 testimony this is a pretty ordinary event, not  
21 something that would stick out in your mind?

22 A. Say again.

23 Q. Is it fair to say that your testimony is  
24 that you don't recall because this was a pretty

1     ordinary event that doesn't stick out in your mind?

2             A.     Yes.

3             Q.     Okay. And how long are these visits  
4     supposed to be?

5             A.     They can be from 15 minutes to 20 minutes,  
6     25.

7             Q.     Okay. Does the inmate get to decide how  
8     long the visits are?

9             A.     No.

10            Q.     The inmate is basically dependent on the  
11     escort's schedule to get back and -- to get back and  
12     forth from their housing to Division 1; is that  
13     correct?

14            A.     No, it's no escort schedule.

15            Q.     They're dependent on the sheriff's  
16     personnel that are escorting them to go back and  
17     forth; correct?

18            A.     To take them back and forth?

19            Q.     (Nodding head.)

20            A.     Yes.

21            Q.     And while -- do you remember what you did  
22     while these detainees were meeting with people in  
23     the yard?

24            A.     Basically I'm probably going back and sit

1 with other coworkers that was working other  
2 divisions.

3 Q. Okay. And so do you recall specifically  
4 who you were sitting with?

5 A. That I don't know.

6 Q. Do you recall discussing Mr. Johnson with  
7 any other sheriff's personnel on that day?

8 A. No.

9 Q. Okay. And then do you recall at some  
10 point taking Mr. Johnson back to Division 8?

11 A. Once they're done with their visit, I have  
12 to -- everybody that I was assigned to, yes, we took  
13 them back to their division.

14 Q. Okay. And do you have a specific  
15 recollection of taking them back?

16 A. No.

17 Q. Okay. You just assume that that's  
18 something that would have happened?

19 A. If I'm assigned to Division 8, yes, I'll  
20 have to take them back.

21 Q. Okay. But you don't specifically remember  
22 taking him back in your mind's eye?

23 A. No.

24 Q. Okay. So is it fair to say that you don't

1     remember him complaining about his cuffs on the way  
2     back?

3             A.     He never complained.

4             Q.     Okay. So you do remember?

5             A.     I would -- I would remember if somebody  
6     would have complained to me, but no one ever said  
7     anything to me about no handcuffs.

8             Q.     Okay. So it's your testimony that you  
9     would have remembered if someone had complained and  
10    you don't really remember, therefore you assume that  
11    nobody complained. Is that fair to say?

12            A.     No.

13            Q.     Can you correct me?

14            A.     In my job with escorting people to and  
15    from, you know, if someone would have complained  
16    about the handcuffs, I would have remembered that.

17            Q.     Okay.

18            A.     But in my movement at that time, no one  
19    ever said anything to me about their handcuffs.

20            Q.     But you don't actually remember the  
21    specifics of taking him back to Division 8. Is that  
22    fair to say?

23            A.     Basically far as when I take them back, I  
24    have to take them back to their assigned tier,



1 unhandcuff them, and their officer that's working  
2 the tier have to come and receive them back. So we  
3 have their ID because they can't go back without  
4 their ID. So once I give the ID to the officer, the  
5 officer basically kind of like, I guess they checks  
6 them in and go back to their tier.

7 Q. Okay. And that's your understanding of  
8 sheriff's policy; correct?

9 A. Yes.

10 Q. But it's -- I think you testified earlier  
11 that you don't remember in your mind's eye actually  
12 taking him back?

13 A. If I -- I had several inmates with me that  
14 day, so he probably was one of them that was -- if  
15 he's assigned to Division RTU, then yes, I took him  
16 back.

17 Q. Okay. And I understand that as a fact of  
18 history you took him back. I'm just saying do you  
19 actually remember taking him back, and it seems to  
20 me the answer is no; correct?

21 A. Yes, I took him back.

22 Q. You took him back, but do you remember  
23 taking him back?

24 A. Yes.

1           Q.    Okay.  And what do you remember about  
2   taking him back?

3           A.    Basically once he was done with his visit,  
4   we walked back through the tunnel, back to RTU, and  
5   me unhandcuffing him and giving him back to his  
6   assigned tier officer.

7           Q.    Okay.  And do you remember who his  
8   assigned tier officer was?

9           A.    No, I don't.

10          Q.    Did you discuss anything about the  
11   handcuffs with the assigned tier officer?

12          A.    No.

13          Q.    Okay.  And did you ever hear anything  
14   about that handcuffing of Mr. Johnson on  
15   July 19th, 2020, in the following days?

16          A.    No.

17          Q.    Okay.  Did you hear anything about that in  
18   the following weeks?

19          A.    No.

20          Q.    Is the first time you -- that came back to  
21   mind after the filing of this lawsuit?

22          A.    Yeah.

23          Q.    Okay.  So you had -- is it fair to say  
24   that you played no role in any investigation into

1 any grievance that Mr. Johnson submitted relating to  
2 this incident?

3 A. Yes, I paid no role in it.

4 Q. Okay. And you were not even aware of that  
5 grievance. Is that your testimony?

6 A. Correct.

7 Q. Okay. How many -- how many inmates do you  
8 believe or detainees -- what terminology do you use?  
9 Inmates or detainees?

10 A. No. IICs.

11 Q. IIC.

12 A. Uh-huh.

13 Q. How many IICs do you think you moved  
14 around the prison on that day in -- on July 19th,  
15 2020, if you can estimate?

16 A. That I can't recall.

17 Q. Would it have been more than ten?

18 A. Yes.

19 Q. Would it have been more than 20?

20 A. That I can't recall.

21 Q. Okay. In any given week in July of 2020,  
22 would you have moved more than 50 people?

23 A. Within a week?

24 Q. Yeah.

1           A.     Depends on the business of the jail. You  
2 know, that I can't answer because I don't work that  
3 particular day. Like I said, I could. I work my  
4 normal assignment, doesn't always consist of me  
5 transporting detainees.

6           Q.     Okay. It seems that you do this sort of  
7 work relatively frequently, and I'm trying to figure  
8 out why you remember at least part of your  
9 interactions with Mr. Johnson when this is such an  
10 ordinary occurrence.

11          A.     Because that particular day when I was  
12 assigned to transporting back and forth, I  
13 remembered that I didn't have no one complain to me  
14 about handcuffs. I think that day basically was a  
15 regular particular day that went normally and  
16 smoothly as --

17          Q.     Okay.

18          A.     -- any.

19          Q.     Do you recall, do you know whether you  
20 worked the following day, on July 20th?

21          A.     No, I don't. I was worked back into my  
22 regular external operations.

23          Q.     The following day?

24          A.     Yes.

1           Q.    Okay.  And do you recall what your duties  
2   were on July 20th?

3           A.    That I don't know.

4           Q.    Do you recall what your duties were the  
5   day before, on July 18th?

6           A.    That I don't.

7           Q.    Okay.  And I assume that the same, that  
8   same would be true of the 17th?

9           A.    Yes.

10          Q.    And the same would be true of the 16th?

11          A.    Yes.

12          Q.    Okay.  But you do recall what you were  
13   doing on July 19th, 2020; correct?

14          A.    Yes.

15          Q.    Okay.  Again, I'm just trying to figure  
16   out if you can, you can explain why you have a  
17   distinctive recollection of that day.

18          A.    Because like, again, I don't normally work  
19   visits.  It's not my normal assignment.  My regular  
20   assignment is external operations.  So that  
21   particular day when I was transporting for visits, I  
22   volunteered for overtime and was working visits, not  
23   my regular duties as external operations.  So that  
24   particular one day, in order for me to be over there

1 transporting visitors, that's where I witnessed  
2 something outside of my regular duties.

3 Q. All right. When you were first -- when  
4 you first began working -- and I apologize if you  
5 can hear some chainsaw. There's a city crew cutting  
6 trees out here.

7 When you first were hired by the sheriff's  
8 office, did you receive training in putting  
9 restraints on IICs or detainees?

10 A. Yes. When you're first hired, you had to  
11 go through the academy process.

12 Q. And is the academy run by the sheriff's  
13 office?

14 A. Yes.

15 Q. Okay. And are you trained in applying  
16 different kinds of restraints on persons detained by  
17 the Cook County jail?

18 A. Yes.

19 Q. Okay. And what types of restraints are  
20 there?

21 A. We have handcuffs, we have leg shackles,  
22 and it's a blue box.

23 Q. Can you describe the last one?

24 A. The blue box?

1 Q. Yes.

2 A. The blue box is like a little square blue  
3 box with a metal piece that comes in the middle. So  
4 once you blue boxing a person, it takes the blue box  
5 and handcuffs and a chain. And basically once you  
6 blue box them, their arms are like this (indicating)  
7 and the blue box goes in the middle and you bring it  
8 to they chest and you wrap the chain around their  
9 waist.

10 Q. Is that like a more high security method  
11 of restraint?

12 A. Yes.

13 Q. Okay. And have you transported in your  
14 career at the -- well, strike that.

15 Since you started working at the sheriff's  
16 office, do you receive additional training in  
17 applying restraints?

18 A. Yes. Because once you in sheriff's  
19 office, we have to go to this thing called  
20 in-service training. We go there once a year. And  
21 once a year in that in-service training, you do --  
22 it's almost like a refresher course that you takes  
23 and you learn basically, you know, like refresher  
24 course of like requalifying with your weapon. You

1 have defense tactics where you are training with  
2 some type of defense tactics if someone is trying to  
3 attack you.

4 Then you have a segment where we do have  
5 handcuffing where they train you on how to secure  
6 properly a IIC. So as part of our training, we have  
7 to go there once a year.

8 Q. And how long does that training period  
9 last, that yearly retraining period?

10 A. Normally it be a week that you will have  
11 to go in for that training period; but now recently  
12 they have cut it down to like three days.

13 Q. Okay. And do you know when the -- do you  
14 recall when the transition from a week to three days  
15 happened?

16 A. That I don't recall.

17 Q. Okay. And when you transport people to  
18 and fro from the jail to Stroger Hospital, is that  
19 something you do relatively frequently?

20 A. Yes.

21 Q. Is that something you do on more than once  
22 a week on average?

23 A. If I'm assigned to that assignment, once  
24 again, I said I'm in external ops, so I could be



1 assigned to Stroger Hospital. So if I'm assigned to  
2 Stroger Hospital, we are just at the hospital.

3 Q. Okay.

4 A. And we transport IICs from our office to  
5 their doctor's appointment, if you're assigned to  
6 Stroger Hospital.

7 Q. So you have an office in --

8 MR. BLEIFUSS PRADOS: Can we go off the  
9 record for just a quick second.

10 (WHEREUPON, an off-the-record  
11 discussion was held.)

12 MR. BLEIFUSS PRADOS: If we can go back on  
13 the record.

14 BY MR. BLEIFUSS PRADOS:

15 Q. So is there a office -- so you were  
16 testifying about an office that the sheriff has  
17 inside of Stroger Hospital; is that right?

18 A. That's correct.

19 Q. And does that function kind of as a  
20 waiting room for the IICs?

21 A. Yes.

22 Q. And it's I-I-C, not I-C-C?

23 A. IIC, individuals in custody.

24 Q. Individuals in custody. Okay.

1           And when an IIC has to go from that office  
2   to their doctor's office or whatever the clinical  
3   setting is, are they in restraints?

4           A.    Yes.

5           Q.    Okay.  And what kind of restraints are  
6   they in?

7           A.    They're in leg shackles, and they are also  
8   are in handcuff with the blue box and chain.

9           Q.    Okay.  And that's a more secure method  
10   that is used in Stroger?

11          A.    Yes.

12          Q.    Okay.  And so ordinarily a less secure  
13   method is used in -- within divisions of the jail  
14   itself.  Is that fair to say?

15          MR. O'CONNOR:  Objection.

16          THE WITNESS:  Did somebody say something?

17          MR. BLEIFUSS PRADOS:  Was there an  
18   objection?

19          MR. O'CONNOR:  Yes, but you can answer.

20          MR. BLEIFUSS PRADOS:  Okay.

21   BY THE WITNESS:

22          A.    Can you repeat the question?

23   BY MR. BLEIFUSS PRADOS:

24          Q.    Yes.  Is there typically a less, a lower

1 security method is used for transporting IICs within  
2 the divisions of the jail?

3 A. Depends on the security level of the IIC,  
4 I guess. So you can say yes.

5 Q. Do you recall, know or recall what  
6 Douglas Johnson's security level was on July 19th,  
7 2020?

8 A. No.

9 Q. Okay. Is there any particular policy or  
10 protocol you're aware of for adjusting -- I'm sorry,  
11 for transporting IICs or detainees with canes?

12 A. With canes?

13 Q. Yes.

14 A. No, there's no particular policy.

15 Q. Okay. And are there certain IICs or  
16 detained persons that have special permission to  
17 have canes?

18 A. Yes, you do have to have special  
19 permission to have a cane.

20 Q. Okay. Do you recall whether you asked  
21 Mr. Johnson on July 19th, 2020, whether he had  
22 permission to use a cane?

23 A. Yes.

24 Q. You did ask him?

1           A.     Yes.

2           Q.     And what did he say?

3           A.     When he came out, he stated, yes, that  
4     was -- this is his cane. On the cane, he has a  
5     sticker with his name and ID on it to let you know  
6     that that is his particular cane, belongs to him.

7           Q.     Okay. And is there like a bar code on the  
8     sticker, anything like that?

9           A.     I believe so.

10          Q.     Is that something you would scan or you  
11     just look at it?

12          A.     No, just look at it, since it have his  
13     name and ID number on it too.

14          Q.     Do you recall checking that it was his  
15     cane?

16          A.     Yes.

17          Q.     Do you recall that because you actually  
18     have a memory of that, or is that just something you  
19     would do in the normal course of affairs?

20          A.     I actually remember that.

21          Q.     Okay. And is it your testimony that in  
22     the -- throughout the entire, your entire  
23     interaction with Mr. Johnson, he never once  
24     complained about the tightness of the handcuffs?

1           A.     No.

2           Q.     That is, that is what your testimony;  
3     correct?

4           A.     My testimony, he never complained to me,  
5     no.

6           Q.     And the only comment he made about the  
7     handcuffs, according to your recollection, is that  
8     he said he had a no handcuff order; is that correct?

9           A.     Yes.

10          Q.     Apart from that, is there anything else  
11     distinctive or at all memorable about your  
12     interaction with Mr. Johnson on that day?

13          A.     No.

14          Q.     What discretion do you have -- first of  
15     all, in terms of the policies of applying restraints  
16     to IICs or detainees, have those policies changed at  
17     all since 2020 and the present day?

18          A.     My recollection, no.

19          Q.     I'm sorry, I didn't hear that.

20          A.     To my recollections, no.

21          Q.     Okay. And what discretion do sheriff's  
22     personnel have in when and whether to apply  
23     handcuffs to an IIC?

24          A.     Explain what you mean by "discretion."

1           Q.    I mean what kind of room is there for  
2   making a judgment call as to, one, when handcuffs  
3   are appropriate versus when they are not  
4   appropriate?

5           A.    When a IIC is being transported or moved,  
6   it's they must be handcuffed.

7           Q.    Okay.  Have you ever observed -- have you  
8   ever waived that requirement?

9           A.    No.

10          Q.    Have you ever observed other sheriff's  
11   personnel transport a person without handcuffs?

12          A.    I can't testify what other personnels  
13   would do.

14          Q.    Could you speak up.  I'm sorry.

15          A.    I said, I can't testify about what other  
16   personnels might do.

17          Q.    I'm saying, I'm asking have you observed  
18   other people transport persons between divisions  
19   without handcuffs?

20          A.    Without handcuffs?  Yes.

21          Q.    You have seen that happen?

22          A.    Not between divisions but inside if I'm  
23   inside the division or something like that, yes.

24          Q.    Okay.  And so it's your testimony that

1 never -- you would never have someone transported  
2 from Division 8 to Division 1 without handcuffs?

3 A. Without handcuffs, no.

4 Q. Okay. And it's your testimony that use of  
5 a -- the use of a cane has no influence on whether  
6 or not or how a person is handcuffed?

7 A. No.

8 MR. BLEIFUSS PRADOS: Okay. We are almost  
9 at the hour mark. I just ask to take a ten-minute  
10 break. I may have to relocate because this is an  
11 incredible circus out here.

12 Okay. Could we just go off the record for  
13 ten minutes.

14 (WHEREUPON, a short break was  
15 taken.)

16 MR. BLEIFUSS PRADOS: We are back on the  
17 record. Thanks again for your patience. I've  
18 relocated.

19 BY MR. BLEIFUSS PRADOS:

20 Q. Officer, have you ever transported an IIC  
21 with a no handcuffs order?

22 A. No.

23 Q. Never in your career?

24 A. No handcuffs order? No.

1           Q.    Do you know how a no handcuffs order would  
2   be communicated to you or how you would be alerted  
3   to a no handcuffs order?

4           A.    If IIC has a no handcuff order, normally  
5   they would notify us, state it to us if they have  
6   one. And if they do have one, they will have to  
7   produce it.

8           Q.    So it would be a piece of paper that IIC  
9   would have on their person?

10          A.    Yes.

11          Q.    Okay. Have you ever seen a no handcuffs  
12   order?

13          A.    No.

14          Q.    So as far as you know, there's no system  
15   that by which sheriff's personnel would alert you  
16   about a no handcuffs order. Is that fair to say?

17          A.    Correct.

18          Q.    Is there any system that would alert you  
19   to a inmate having any kind of special needs with  
20   respect to being transported?

21          A.    Yes.

22          Q.    What is that system?

23          A.    As far as -- well, pertaining to female  
24   IICs, if they are pregnant, they are not to be



1 handcuffed or shackled.

2 Q. What about male IICs?

3 A. No.

4 Q. Is the answer no?

5 A. No, I never seen one.

6 Q. Have you ever in your career loosened  
7 handcuffs because they were too tight?

8 A. Yes.

9 Q. Okay. And how did you determine that they  
10 were too tight?

11 A. The IIC might have stated to me that, you  
12 know, he felt that the handcuffs were a little too  
13 tight. If I come over and once again do the  
14 two-finger check to see if I can stick my finger  
15 there, if I can't get my finger in there, then I  
16 would assume they might be a little tight and I  
17 would loosen them up until I can get my fingers in  
18 there, then I would leave it there.

19 Q. Okay. Is it ultimately a judgment call  
20 that you have to make as to whether the handcuffs  
21 are too tight or tight enough?

22 A. Basically, yes.

23 Q. And when you say sticking two fingers in  
24 there, what does that mean exactly? Is that where

1     there's -- you're able to squeeze your finger under  
2     the handcuff?

3           A.     If you're able to squeeze your two fingers  
4     in between the handcuff and the person's wrist, it  
5     let's you know that there's enough space, room in  
6     there for the handcuff and not extra tight, you  
7     know.

8           Q.     Is it your responsibility to apply  
9     handcuffs in such a way that the IIC is not injured?

10          A.     In such a way that they're not injured?  
11     Yes, how you apply them, yes.

12          Q.     Can you just repeat that answer because I  
13     didn't hear it very clearly.

14          A.     Yes.

15          Q.     Okay. Have you ever been disciplined for  
16     any of your -- for your treatment of a detainee at  
17     the Cook County jail?

18          A.     For treatment of a detainee? I would say  
19     no.

20          Q.     Are you aware of specific written policies  
21     regarding the use of restraints?

22          A.     Am I aware of policies?

23          Q.     About written policies about the use of  
24     restraints?

1           A.     Yes.

2           Q.     Okay. And have you reviewed those  
3 policies in preparation for today's deposition?

4           A.     No.

5           Q.     Are those policies shown to you at  
6 trainings, or how are you aware of these policies?

7           A.     We get policies and procedures through  
8 e-mail, and every e-mail, you know, you read your  
9 e-mail and you read if there's been a update on  
10 anything procedure. So basically through e-mails.

11          Q.     Okay. And are they posted anywhere, are  
12 written policies posted anywhere, on a bulletin  
13 board or anything like that?

14          A.     Pertaining to handcuffing?

15          Q.     Yes, pertaining to handcuffing.

16          A.     Not to my knowledge, no.

17          Q.     Okay. Have you ever been a defendant in  
18 any civil lawsuit apart from this one?

19          A.     Yes, I have.

20          Q.     Do you recall when that lawsuit was filed?

21          A.     It was many years ago. I don't recall  
22 exact time but it was --

23          Q.     Okay.

24          A.     -- close to beginning of my career.

1           Q.    Did you say it was at the beginning of  
2 your career?

3           A.    Yes.

4           Q.    Do you recall what was alleged in that  
5 lawsuit?

6           A.    Yes.   The detainee was suing for spoiled  
7 milk.

8           Q.    Okay.   And apart from that, have you been  
9 a defendant in any other civil suits?

10          A.    I didn't answer.   No.

11          Q.    Okay.   And I can narrow that down to any  
12 civil suits related to your work as a sheriff's  
13 employee.

14          A.    Not a defendant but maybe a witness.

15          Q.    Not as a defendant but as a witness, is  
16 that what you said?

17          A.    Yes.   Yes.

18          Q.    And have you testified in any trials?

19          A.    Yes.

20          Q.    In civil suits?

21          A.    I guess it was a civil suit.

22          Q.    Okay.   Do you recall when that, when you  
23 testified in the civil suit?

24          A.    I don't remember when it was.

1           Q.    Do you recall the names of the parties in  
2   that civil suit?

3           A.    No, I don't.

4           Q.    Do you recall the allegations in that  
5   civil suit?

6           A.    I believe it was a witness to like sexual  
7   harassment or something like, something like that.

8           Q.    Okay. Did you actually testify in court?

9           A.    Yes.

10          Q.    Do you know whether you were called by the  
11   plaintiff or the defense?

12          A.    The defense. No, it was the plaintiff.

13          Q.    Okay. And have you been disciplined on  
14   some occasion for bringing contraband into the jail?

15          A.    Yes.

16          Q.    And what was that contraband?

17          A.    A cell phone.

18          Q.    And were you briefly suspended for that?

19          A.    I received five days, but it was with  
20   options so.

21          Q.    Did you say "with options"?

22          A.    Yes.

23          Q.    What does with options mean?

24          A.    Basically instead of being suspended, I

1 can give them like some time in lieu of being  
2 suspension, give some time so I still came to work.

3 Q. Am I right that you testified that on  
4 July 19th, 2020, you were working overtime?

5 A. Yes.

6 Q. And is that the time and a half in terms  
7 of your pay?

8 A. Correct.

9 Q. Okay. And so you had volunteered to do  
10 that time --

11 A. Yes.

12 Q. -- to work that shift?

13 And again, I'm sorry. I'm sometimes  
14 cutting you off. I will try to wait for you to  
15 finish your answer before I ask my next question,  
16 and if you could do the same.

17 I'm going to show you what I'm going to  
18 designate as Bacon Exhibit 1. Do you see this  
19 document?

20 A. Yes.

21 (WHEREUPON, Exhibit 1 was  
22 identified.)

23 BY MR. BLEIFUSS PRADOS:

24 Q. And are you familiar with this document?

1           A.     It's a policy and procedure.

2           Q.     Do you have a specific recollection of  
3     ever seeing this document?

4           A.     I've seen it.

5           Q.     When do you think you saw it last?

6           A.     That I can't remember.

7           Q.     Okay. And do you think you've seen it  
8     because it's the kind of thing that would be  
9     e-mailed to you?

10          A.     Yes.

11          Q.     Okay. Do you have a specific recollection  
12     of reviewing this document?

13          A.     No.

14          Q.     Okay. I'm now turning to the second page  
15     of Exhibit 1, and I'm highlighting a section here,  
16     Inmates should be restrained during movement based  
17     on individual security classification with higher  
18     risk inmates in handcuffs, waist chains, and leg  
19     irons. An exception to this procedure is when an  
20     inmate has a physical disability where restraint  
21     devices may cause injury.

22                 Did I read that correctly?

23          A.     Yes.

24          Q.     And are you aware of that exception being

1 a part of the written policy?

2 A. Yes.

3 Q. Have you received any training in how to  
4 make an assessment as to whether that exception  
5 should apply?

6 A. No specific training, no.

7 Q. Could you repeat that answer, please.

8 A. No specific training, no.

9 Q. Okay. I am now showing you what I would  
10 designate as Bacon Exhibit 2. This is policy 709,  
11 and the Bates number is Bates 156 on the starting  
12 page.

13 (WHEREUPON, Exhibit 2 was  
14 identified.)

15 BY MR. BLEIFUSS PRADOS:

16 Q. Is it fair to say that this is also a  
17 written policy that may have been e-mailed to you  
18 but that you don't recall specifically reviewing?

19 A. It's possible [audio distortion] yes.

20 Q. Could you please repeat that answer.

21 A. Yes.

22 Q. Okay. I'm turning now to the third page  
23 of this exhibit 709.3.1, Use of Restraints on  
24 Disabled Subjects, and I'm looking at these last



1 paragraphs here. When applying restraints to a  
2 disabled inmate, the responsible sworn member shall  
3 promptly notify his or her immediate on-duty  
4 supervisor.

5 Did I read that correctly?

6 A. Yes.

7 Q. Do you recall ever receiving any training  
8 on this specific feature of this policy?

9 A. No.

10 Q. Okay. When restraints are used on a  
11 disabled inmate, the appropriate incident report  
12 shall be completed by the assigned sworn member.  
13 The report shall document the totality of the  
14 circumstances.

15 Do you recall ever being specifically  
16 trained in this feature of this policy?

17 A. No.

18 Q. And just to round out this subsection,  
19 this is subsection 709.3.1, Use of Restraints on  
20 Disabled Subjects, can you take a moment to read  
21 this highlighted portion? First of all, is it large  
22 enough for you to read, or would you like me to make  
23 it bigger?

24 A. It's okay.

1 Q. Is it big enough?

2 A. Yes. You want the whole thing?

3 Q. If you can just read it to yourself and  
4 let me know when you're finished reviewing it.

5 A. Oh, okay. I'm done.

6 Q. Okay. Thanks. And do you recall  
7 specifically receiving any training in the  
8 implementation of this subsection of this policy?

9 A. No.

10 Q. Meaning the Section 709.3.1?

11 A. No training, no.

12 Q. Okay. And am I right that you testified  
13 that you didn't write any report about the  
14 handcuffing of Mr. Johnson; correct?

15 A. Correct.

16 Q. And you didn't discuss the handcuffing of  
17 Mr. Johnson with any other sheriff's personnel;  
18 correct?

19 A. Correct.

20 Q. Okay. I'm going to stop sharing.

21 I'm now sharing with you what we'll call  
22 Bacon Exhibit 3.

23 (WHEREUPON, Exhibit 3 was  
24 identified.)

1 BY MR. BLEIFUSS PRADOS:

2 Q. Can you see this document?

3 A. Yes.

4 Q. Have you ever seen this document before?

5 A. Yesterday.

6 Q. Okay. So you saw this document in  
7 preparation for this deposition?

8 A. Yes.

9 Q. And prior to yesterday, had you never seen  
10 this before?

11 A. No.

12 Q. Okay. And is this an inmate grievance  
13 form?

14 A. Yes.

15 Q. I'm going to enlarge it a little bit. Now  
16 I don't think I really can.

17 Are you able to read the narrative  
18 portion --

19 A. Yes.

20 Q. -- of this?

21 A. Yes.

22 Q. It appears to say.

23 On Sunday, visiting day, I was  
24 called from my unit. I went out the door

1           waiting. Was Officer Bacon. He see that I was  
2           on a cane. I told him I don't get cuffed up  
3           because the cane. He said that I would be  
4           cuffed up today. I had a hard time walking,  
5           and the cuffs was digging down into my wrist  
6           and I was sweating there and on the way back.  
7           And I told him that the cuffs hurting and I'm  
8           in a lot of pain. And he stopped and looked  
9           and turned around and said keep walking. I was  
10          sweating so bad, the mask was wet. I asked can  
11          I pull it down or get another one out. He said  
12          no. I was short of breath.

13                 You don't recall him saying anything like  
14          that to you on the 19th of July --

15          A.     No.

16          Q.     -- 2020?

17          A.     No.

18          Q.     Okay. Do you recognize -- the signatures  
19          at the bottom, those would be by sheriff's  
20          personnel; is that correct?

21          A.     That I don't remember. I'm not sure.

22          Q.     You're not sure?

23          A.     No.

24          Q.     Do you --

1           A.     -- civilian.

2           Q.     I'm sorry, I couldn't hear you.

3           A.     I thought it was a civilian because I  
4     don't see no badge number.

5           Q.     So do you -- are you involved ever in  
6     processing these grievance forms, or is that not  
7     something you do?

8           A.     No, I do not.

9           Q.     And you don't recall ever being asked  
10    about these allegations in the year 2020?

11          A.     No.

12          Q.     Have you ever been convicted of any  
13    crimes?

14          A.     No.

15          Q.     Have you ever discussed this lawsuit with  
16    any other sheriff's personnel?

17          A.     No.

18               MR. BLEIFUSS PRADOS: All right. I don't  
19    think I have very many more questions, but I ask  
20    that we take another ten-minute break and like  
21    hopefully that will be it for me. Thank you so much  
22    for your patience. Again, I think it's a miracle  
23    that you can't hear the cacophony that's going on  
24    around me because it's nightmarish.

1                   If we can go off the record, please.

2                               (WHEREUPON, a short break was  
3                               taken.)

4                   MR. BLEIFUSS PRADOS: Can we go back on  
5 the record.

6 BY MR. BLEIFUSS PRADOS:

7           Q. All right. I showed you, Officer Bacon, a  
8 couple of policies which were Bacon Exhibits 1 and  
9 2. How, in general, do you receive information  
10 about sheriff's policies? Is it through e-mail?

11          A. Yeah, through e-mail.

12          Q. Okay. And when policies come out, are  
13 there special trainings for those policies or is  
14 that wrapped up into the yearly training?

15          A. Basically just, no, the yearly training.  
16 Policies come through the e-mail and basically just  
17 going to read them, acknowledge.

18          Q. I'm sorry. Can we repeat that again.  
19 It's my fault. It's just the environment is very  
20 loud here.

21          A. Basically when the policies come through  
22 e-mail, it's a policy or update on a policy,  
23 basically we get e-mail. And it's up to us, we read  
24 the e-mail. Then we have to acknowledge that we got

1     it and read it.

2           Q.     Okay. And how do you acknowledge you  
3     received the e-mail?

4           A.     On the e-mail at the bottom of it, it has  
5     a little button that says acknowledge.

6           Q.     Okay. Acknowledge that you received it?

7           A.     Yes.

8           Q.     Okay. And is there any way they verify  
9     that you've read the e-mail?

10          A.     No.

11          Q.     During COVID, were you receiving your  
12     annual trainings?

13          A.     Yes.

14          Q.     How were they done? How were they  
15     conducted?

16          A.     Basically a couple of time I believe some  
17     of it was on computer, like a message of training  
18     that you get. And when you have to requalify with  
19     your weapon, of course you have to go back to the  
20     academy and stuff.

21          Q.     Do you recall in 2020 when your training  
22     happened?

23          A.     I don't recall the exact month.

24          Q.     Is it generally the same month every year?

1           A.    No, it can change up.

2           Q.    And again, when you verify that you've  
3   received an e-mail, is that -- that alerts the  
4   sheriff to the fact that you opened the e-mail?  If  
5   you know, is that how it works?

6           A.    That I don't know.

7           Q.    Are policies, do they come to you as  
8   attachments to the e-mail?

9           A.    No.  It just come to us with the e-mail,  
10   it's all the employees.

11          Q.    And then you check to mark that you have  
12   received the e-mail; correct?

13          A.    Right.  Once you get the policies, you  
14   check -- there's a button that says acknowledge, and  
15   you acknowledge that you read it because you have to  
16   go through it first before you acknowledge.

17          Q.    Okay.  And is there any way they can prove  
18   that you've read it when you mark that check mark?

19          A.    No.

20          Q.    Okay.  Is the policies, do they come as  
21   just one big document or are they in different  
22   chapters or segments?

23          A.    I guess it's different segments or  
24   whatever.  Depends on, you know, what the policy is



1     about obtained so.

2           Q.     And then the check mark box is at the  
3     bottom of the screen and you check it to indicate  
4     that you've received it?

5           A.     Yes.

6           Q.     And again, it's your testimony that you've  
7     never seen an inmate transported between divisions  
8     without handcuffs apart from pregnant women?

9           A.     Between divisions?

10          Q.     Yes.

11          A.     No.

12          Q.     And at these annual trainings, are you  
13     shown written policies, or is it related to you  
14     orally, the policies related to you orally?

15          A.     At the trainings?

16          Q.     Yes.

17          A.     No. They might be related to us orally,  
18     but mostly it's just through e-mails.

19          Q.     Okay. So most of your education on  
20     sheriff's policies comes through e-mail?

21          A.     Yes.

22                 MR. BLEIFUSS PRADOS: I have no further  
23     questions.

24                 MR. STILLMAN: I got a couple.

EXAMINATION

BY MR. STILLMAN:

Q. Do you recall plaintiff ever falling while you were taking him either to or from the yard for the visit?

A. Say that again. Did you say "falling"?

Q. Falling, falling down the stairs?

A. No.

Q. Do you recall him struggling in any capacity such that it, like, gave you pause during the journey back to or from?

A. No.

Q. Did Johnson ever ask you about any issues with his mask or replacing his mask?

A. No.

Q. Did he ever request that you help him remove his mask or that he could remove his mask?

A. No.

Q. Would anything have stopped him from being able to move his mask down himself?

A. No.

Q. And he never indicated anything to you that his mask was wet or soaked through?

A. No.

1           Q.    Did he ever indicate he was having trouble  
2   breathing to you?

3           A.    No.

4           Q.    Would you consider yourself qualified  
5   enough to recognize the signs of an asthma attack?

6           A.    No.

7           Q.    Did he ever mention anything about asthma  
8   or suffering from asthma or having an asthma attack?

9           A.    No.

10          Q.    Was there ever -- did it occur that you  
11   allowed him to do an emergency -- scratch that.

12                Did you ever emergency uncuff him to allow  
13   him to medicate himself?

14          A.    No.

15          Q.    But you did take the elevator during the  
16   journey back?

17          A.    Yes.

18               MR. STILLMAN:   All right.   No further  
19   questions.

20               MR. O'CONNOR:   I have no additional  
21   questions.

22               MR. BLEIFUSS PRADOS:   Just one question  
23   based on the circumstances of the trek between the  
24   divisions.

1                                   FURTHER EXAMINATION

2           BY MR. BLEIFUSS PRADOS:

3                 Q.     Did it occur to you that it might be  
4     difficult for a person to walk with a cane while  
5     being handcuffed when you were escorting  
6     Mr. Johnson?

7                 A.     No.

8                 MR. BLEIFUSS PRADOS:   Okay.   I have  
9     nothing else.

10                MR. STILLMAN:   That's it.

11                MR. BLEIFUSS PRADOS:   So I guess the  
12     client, your client, Zachary, can decide whether to  
13     waive signature.

14                MR. STILLMAN:   Yeah.   Antwaun, would you  
15     like to review it, or are you okay just with what  
16     you've said today.

17                THE WITNESS:   I'm okay.

18                MR. STILLMAN:   You'll waive?

19                THE WITNESS:   Yeah.

20                MR. STILLMAN:   So we'll waive.

21                THE COURT REPORTER:   Are you ordering at  
22     this time?

23                MR. BLEIFUSS PRADOS:   I'm not ordering it  
24     right now.   Can I have -- should I reach out to

1 Veritext if and when I order? We can off go off the  
2 record.

3 (Signature waived.)

4 (WHEREUPON, at 12:19 P.M. the  
5 deposition was concluded.)  
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1 CERTIFICATE  
2 OF  
3 CERTIFIED SHORTHAND REPORTER  
4

5 I, RHONDA K. WEILAND, a Certified  
6 Shorthand Reporter of the State of Illinois, CSR  
7 License No. 084-004438, do hereby certify:

8 That previous to the commencement of the  
9 examination of the aforesaid witness, the witness  
10 was duly sworn by me to testify the whole truth  
11 concerning the matters herein;

12 That the foregoing deposition transcript  
13 was stenographically reported by me and was  
14 thereafter reduced to typewriting under my personal  
15 direction and constitutes a true and accurate record  
16 of the testimony given and the proceedings had at  
17 the aforesaid deposition;

18 That the said deposition was taken before  
19 me at the time and place specified;

20 That I am not a relative or employee or  
21 attorney or counsel for any of the parties herein,  
22 nor a relative or employee of such attorney or  
23 counsel for any of the parties hereto, nor am I  
24 interested directly or indirectly in the outcome of

1     this action.

2                   IN WITNESS WHEREOF, I do hereunto set my  
3     hand at Chicago, Illinois, this 11th day of April,  
4     2024.

5                   

6                   -----  
7                   RHONDA K. WEILAND, CSR  
8                   License No. 084-004438  
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[03718 - answer]

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**[complaint - destination]**

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## [unhandcuff - yard]

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**[yard - zstillman]**

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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